

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ANTHONY VAUGHN)

v.)

UNITED STATES OF AMERICA)

CIVIL No. 03-12492-MEL

MOTION TO EXTEND TIME

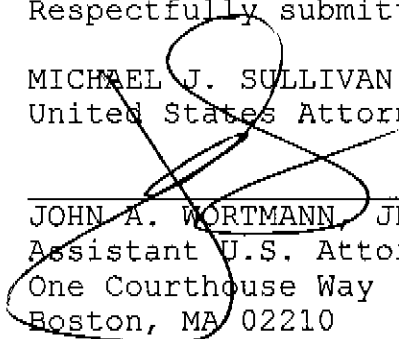
The United States of America hereby moves that the time within which it may respond to the Petition in this matter be extended for additional 60 days until April 10, 2004. As grounds therefore, the undersigned AUSA states that he has just completed proceedings in United States v. Sampson, Criminal No. 01-10384-MLW and that he has trials presently scheduled to begin on March 8, 2003 in United States v. Given, 03-10035-RWZ and on April 5 in United States v. Martinez, 03-10323-NG. Because of these matters, and the backlog of other work that has grown while the undersigned was trying the Sampson case, the government respectfully requests that the requested extension be granted. In seeking this extension, the government also notes that the Petition only effects the criminal history category of the Defendant. Hence, even if the defendant's request for relief were to be granted, he will not be eligible for release a substantial period and hence will suffer no prejudice if the

requested extension is granted.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

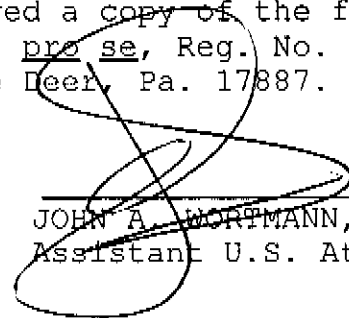
By:



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CERTIFICATE OF SERVICE

I, JOHN A WORTMANN, JR., Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing by mailing a copy to Anthony Vaughn, pro se, Reg. No. 239-19-038, USP Allenwood, PO Box 3000, White Deer, Pa. 17887.

 2.9.04

JOHN A. WORTMANN, JR.
Assistant U.S. Attorney